

Civil Action No. 24-cv-04357

**UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ELIZABETH THOMAS.,

Appellant

v.

P.C.F. PROPERTIES IN TX, LLC, ET AL.,

Appellees

Appeal from the U.S. Bankruptcy Court for the Southern District of Texas, Houston Division
Honorable Alfredo Perez Presiding
Bankruptcy Adversary Case No. 24-03216
Consent Order Dated November 5, 2024

**P.C.F. PROPERTIES IN TX, LLC'S RESPONSE TO APPELLANT'S
MOTION TO STRIKE APPELLEE'S BRIEF (Doc. No.16)**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, P.C.F. PROPERTIES IN TX, LLC, Appellee and Respondent, and files its response to Appellant's Motion to Strike Appellees (sic) Cross Brief for Lack of Jurisdiction, and shows the following:

1 Elizabeth Thomas, Appellant, has appealed the entry of a Consent Order entered in a dismissed chapter 7 bankruptcy filed by James Andersen, Debtor, striking yet another attempted removal of state court cases to federal court in willful and intentional violation of more than a six orders entered in this District by various judges precluding such removals. Appellee filed its brief. See, Doc. 15.

2. On February 22, 2025, Ms. Thomas filed a motion to strike Appellee's brief. See, Doc. 16. Ms. Thomas seeks to strike Appellee's brief on the theory that Appellee did not file a cross appeal. Appellee did not file a cross appeal because Appellee asserts in its brief that the Consent Order is not subject to appellate review and that Ms. Thomas does not have standing to challenge the Consent Order. Appellee adopts its argument and authorities contained in its brief filed on or about February 17, 2025, under Doc. No. 15.

3. Ms. Thomas's motion is meritless and should be denied.

CONCUSION AND PRAYER

Based on the foregoing, the Court should deny Ms. Thomas's motion and dismiss this appeal.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing instrument was served upon the following persons at the address below on this the 24th day of February, 2025, by electronic CM/ECF the addresses listed below:

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